Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
Creation of a Low)) N	MM Docket No. 99-25
Power Radio Service)	
) R	M-9208
) R	M-9242
)	

COMMENTS OF THE CORPORATION FOR PUBLIC BROADCASTING

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SUMMARY

The Corporation for Public Broadcasting ("CPB") is concerned that the introduction of LPFM stations into the FM band, particularly into reserved noncommercial frequencies, will frustrate the goal of making public radio universally available throughout the nation. Noncommercial radio is a *broadcast* service designed to reach large numbers of people as efficiently as possible consistent with Section 307(b) of the Communications Act.

We strongly support the goal of increasing diversity in station ownership and programming. This is more than just rhetoric. Significant CPB funds flow to minority public radio stations. CPB's grant-making criteria are designed to help radio stations improve public service to underserved populations by supporting minority-owned noncommercial stations and minority-targeted programming, while at the same time supporting wide-area and full time service. We firmly believe that low power, intermittent narrowcasting simply is not the way to improve noncommercial radio or to maximize the efficiency of the radio spectrum.

An LPFM station's limited reach, likely minimal operating hours, and susceptibility to interference from nearby stations will make it very difficult to establish and maintain service. Some LPFM stations will survive, but those that do could well reduce the public service from co-channel and adjacent channel stations and prevent these stations (many of which are minority-owned) from reaching far greater numbers of listeners, thus sacrificing the interests of many listeners for the sake of a few broadcasters.

In the 1970's, the Commission found that adding new low power stations to the FM reserved band, while discarding important interference protections, would reduce service from existing stations without providing a sustainable replacement service. The Commission found that many listeners would lose access to clear noncommercial radio signals. Nothing has

changed in the spectral or financial structure of radio since the 1970's to alter the Commission's conclusion. In fact, as the spectrum has become more crowded, the harm from LPFM stations could be much more pronounced. The consequences of interference will be particularly damaging to lightly processed programming – such as classical and jazz music or talk formats typical of public radio – and to the translator stations on which so many public radio listeners rely.

In this proceeding, the Commission is responding to what it considers over-concentration of ownership in *commercial* radio. This is a problem that has nothing to do with noncommercial radio. But the solution the Commission proposes would undermine the philosophical, technical and financial structure of radio in general, and would create particular stresses for noncommercial broadcasting, where over-concentration does not exist. The LPFM proposal threatens to turn a mass medium with both wide and deep appeal into a hodgepodge of little stations with a fragile and limited listener base. True diversity is more fruitfully pursued by enabling more varied licensees to operate full power noncommercial stations with more varied programming over larger areas.

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COMMENTS OF THE CORPORATION FOR PUBLIC BROADCASTING

I. INTRODUCTION.

The Corporation for Public Broadcasting ("CPB") offers these comments in response to the Commission's Notice of Proposed Rule Making in the above-captioned proceeding released February 3, 1999 (the "Notice") proposing to authorize the operation of low power FM (LPFM) radio stations. As it evaluates the benefits it perceives in such a service, the Commission should also carefully consider the interest of the American public in a strong and sustainable noncommercial radio service. The introduction of LPFM stations in the FM band, particularly in the noncommercial segment, is unlikely to serve that interest and could well reduce the nearly universal service that public radio stations now provide. ¹

¹ CPB supports the continued reservation of channels 201-220 of the FM band for noncommercial stations. If an LPFM service is created, we endorse the Notice's proposal to require that any LPFM stations operating in the noncommercial part of the FM band be noncommercial. *See* Notice, ¶¶ 18-19. However, we do not believe that it would be wise to introduce LPFM noncommercial stations, or any LPFM stations, into channels 201-220.

We stress – and we hope it is clear – that CPB has no vested interest in whether the public is served by incumbent or new noncommercial radio stations. We are not defending the economic status quo, nor are we motivated by a desire to protect those who already hold radio licenses. Our charter sets for us a different course: seeing that the entire public is well-served by public radio. After careful study, we have been forced to conclude that, because they are unlikely to be technically benign or economically self-sufficient, LPFM stations would degrade public radio service (including service to minority and other targeted populations) without providing sustainable new service in its place.

In order to nurture a radio service that reaches all Americans in a meaningful way, the Commission must focus on the needs of listeners, not just licensees; that is, on service as well as access. A plan that will squeeze additional stations into the FM band, throw aside important interference protections, and ignore the economics of noncommercial broadcasting may well damage the noncommercial service of a great number of listeners for the sake of a small number of broadcasters and listeners. Thus, while we applaud the Commission's desire to diversify radio station ownership and programming, CPB cannot support the proposed LPFM service as a way to achieve these goals.

* * *

CPB is a private, nonprofit corporation created by Congress in 1967 to oversee "the growth and development of public radio and television broadcasting, including the use of such media for instructional, educational, and cultural purposes." The Public Broadcasting Act requires CPB to distribute each year to public television and radio all of a Congressionally

² Public Broadcasting Act of 1967, 47 U.S.C. § 396(a)(1).

determined sum of money to extend delivery of the service as broadly and in as efficient and economical a way as possible.³ Today, CPB is the largest single source of funding for public television and radio programming, supporting diverse and innovative programming and radio station management.⁴

In our more than 30 years of experience nurturing noncommercial radio, we have learned that there are tradeoffs in the larger markets between increasing the number of licensees and improving service for a wide variety listeners. Radio is inescapably a broadcast medium. It is designed, by economics and longstanding governmental policy, to provide wide-area service to the entire American public. Indeed, only stations capable of reaching broad audiences have the capacity to serve narrow ones.

The Notice proposes fundamentally to change the character of radio and potentially compromise what radio does best – *broadcast* to sizeable populations with signals that can be received easily and over large distances by both target and general populations. It would introduce narrowcast signals with minimal reach in order to increase access to radio.

While CPB strongly endorses the goal of increased access, it does not support access at any cost, particularly when the public must pay the high price of reduced radio service.

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³ See 47 U.S.C. § 396(k)(3)(A)(i)(IV), (B)(ii); see also 47 U.S.C. § 390. In Fiscal Year 1999, CPB's appropriation for public broadcasting totaled \$250 million. See http://www.cpb.org/research/faq/faqp7.html (visited July 30, 1999). Seventy percent of the public radio money must be distributed to licensees and permittees of public radio stations; seven percent is allocated to public radio programming; and twenty-three percent is allocated to public radio licensees and permittees for acquiring programming that is to be distributed nationally, for a national audience. See 47 U.S.C. § 396(k)(3)(A)(iii).

⁴ In 1998, CPB provided a total of \$59,779,956 in radio programming grants and allocations, and radio community service grants. *See* Corporation for Public Broadcasting Annual Report (1998).

II. CPB SUPPORTS INCREASED SERVICE TO, AND RADIO OWNERSHIP BY, MINORITY AND OTHER UNDERSERVED POPULATIONS.

CPB shares and supports the Commission's goal of increasing the representation of traditionally underrepresented and underserved audiences in radio. In fact, our authorizing legislation charges us to promote public telecommunications services "responsive to the interest of people both in particular localities and throughout the United States," especially "unserved and underserved audiences." To this end, CPB awards grants based in part on the licensee's ability and commitment to serve the underserved. Applicants must show that their daily broadcast schedules serve "demonstrated community needs of an educational, informational, and cultural nature, within [the] signal area." Additionally, "to promote the diversification and growth of the public broadcasting audience," new applicants for certain grants in areas that already have a public radio station must show that a different audience will be served by their programming.⁷ These criteria have resulted in a public radio system that successfully serves niche audiences. For example, the number of minority listeners tuning into public radio each week has doubled in the last decade, and approximately one in seven CPB radio grantees is a minority grantee.⁹ We are proud of our commitment to radio diversity and the successes we have fostered.

⁵ 47 U.S.C. at § 396(a)(5)-(6).

⁶ See Corporation for Public Broadcasting, Eligibility Criteria for 1999 for MicroMarket Radio Community Service Grants, Radio Sole Service Assistance Grants, Radio Station Development (STEP) Grants, and Radio National Program Production and Acquisition Grants.

⁷ See Corporation for Public Broadcasting, Eligibility Criteria for 1999 for Radio Station Development (STEP) Grants, and Radio National Program Production and Acquisition Grants.

⁸ See Audience 98, Report 19: Public Radio's Minority Audiences (February 19, 1999).

⁹ See Corporation for Public Broadcasting, Current and Planned CPB Public Radio Minority Service Strategies and Investments—How to Build on Our Success (1999), at 2 ("CPB Minority Service Strategies"). A "minority grantee" is defined as possessing a majority minority staff, a

To those who think of public radio stations as large outlets that distribute nationally syndicated programming, the extent of service tailored to minority and niche audiences may come as a surprise. According to a 1998 survey, 50 of the 352 noncommercial stations CPB funds are minority controlled and broadcast programming designed to appeal to minority audiences; 10 by FY 2000, that number is expected to have increased to at least 60.11 Most stations (63.4%), whether they are small or large, have services that provide minority outreach, as well as one or more paid staff members whose jobs include outreach to the community. 12 CPB also funds radio programming designed to serve minority audiences, and has invested heavily in satellite distribution networks that make it much easier for smaller stations to access such programming. For example, Satélite broadcasts Spanish language programming from Radio Bilinguë of Fresno to stations throughout the country. This includes *Linea Abierta*, a daily two-hour Spanish language telephone call-in program. CPB has also funded a daily onehour telephone call-in program called *Native America Calling* that originates from Albuquerque and Anchorage. In addition to these syndicated programs, stations in both small and large markets originate regular programming for underserved populations. Examples of this programming are attached as Exhibit A.

CPB funding of minority programming and minority-run public radio stations will increase in the future. For example, about 60 minority grantees will receive as much as \$8.7

majority minority board, and a significant measurable minority audience over the prior two years.

¹⁰ See The Corporation for Public Broadcasting, Public Broadcasting and The Needs of Minority and Diverse Audiences and Public Broadcasting's Services to Minorities and Other Groups: A Report to Congress (July 1, 1998), at 97 ("CPB Diversity Report").

¹¹ See CPB Minority Service Strategies, at 2.

¹² See CPB Diversity Report, at 17.

million in FY 2000. This represents an increase of about 34% over the previous year. One-third of CPB's 1999 Program Fund will be invested across projects targeted to people of color. CPB has also funded about 10 projects of about \$50,000 each to help individual minority stations stabilize and increase their audience and community financial support. ¹³

III. THE PROPOSED LPFM SERVICE WILL NOT ACHIEVE FCC GOALS.

A. Radio Fundamentally Requires Wide-Area Audience Reach.

CPB believes that much more needs to be done to diversify noncommercial radio ownership and programming, but not at the price of significantly reducing existing service or service opportunities. We are mindful of the Commission's obligation to ensure the efficient use of spectrum, ¹⁴ and of Congress' determination that "it is in the public interest for the Federal Government to ensure that all citizens of the United States have access to public telecommunications services." Federal funding for public radio is designed to "extend delivery of public telecommunications services to as many citizens of the United States as possible by the most efficient and economical means" and CPB was created to achieve the efficient distribution of "alternative telecommunications services for *all* the citizens of the Nation." In the past three decades, we have made great strides towards providing universal service.

¹³ See CPB Minority Service Strategies, at 2.

¹⁴ See 47 U.S.C. § 307.

¹⁵ *Id.* § 396(a)(9).

¹⁶ *Id.* § 390.

¹⁷ *ld.* § 396(a)(5) (emphasis added). Similarly, Congress created the Federal Communications Commission in order to "make available, so far as possible, to all the people of the United States a rapid, efficient, Nation-wide" radio service. 47 U.S.C. § 151.

Approximately 91% of Americans currently receive at least one public radio signal, ¹⁸ and public radio listenership has increased by more than 80% over the past ten years. ¹⁹ As we now discuss, we believe that universal service and efficient use of the spectrum depends on a broadcast service bottomed on full power, wide-area broadcast stations.

It is a truism that there is a great deal of demand for limited public broadcasting funds (either private or public). Thus, while CPB recognizes the potential value of having smaller stations that require less funding for less service alongside larger, more expensive stations that provide more service, we are careful to direct scarce dollars to where they will do the most public good. To best serve the public, a delicate balance must be struck between the number of public radio licensees and the availability of funds to support them. All radio stations depend on a fairly substantial listener base to survive, and public radio stations in particular rely on audience members both inside and outside their protected contours for membership dollars. Given the limited reach of an LPFM signal, particularly a 10 or 100 watt signal, an LPFM station is unlikely to generate a listener base that provides the required membership revenue even for a very small station. Moreover, the introduction of these LPFM stations could well deprive an existing or future full power station of the ability to reach potential audience members, robbing listeners both inside and outside the protected contour of the service that they have grown to expect without any guarantee that the service will be replaced.

¹⁸ See Corporation for Public Broadcasting, Public Radio: Achieving the Opportunities of the New Media Environment (May 1999).

¹⁹ See http://www.cpb.org/research/faq/faqp11.html (visited July 30, 1999).

²⁰ CPB grants are particularly critical to smaller stations. Although our grants to radio licensees in 1997 accounted for 12% to 15% of total revenue, they (and other federal funds) accounted for more than 20% of revenue for stations with operating budgets of less than \$450,000. *See* CPB

1. The Commission Historically Has Recognized That Public Radio Stations Should Provide Wide-Area Coverage.

Public radio stations, like all radio stations, are a mass medium that require a large audience coverage base. They are not generally designed to provide narrowcast services to a handful of listeners, but rather to reach a fairly substantial population. The goal of wide-area coverage provides both the economic and policy underpinnings for radio and is reflected in the basic architecture of the radio band and service. As the number of listeners reached by radio increases, the public benefit conferred by the service rises proportionally. Accordingly, the Commission has fashioned radio with the goal of "providing, on a nation-wide basis, a stable, efficient, and diverse radio communications service," favoring the development of full service radio broadcasting.²¹

Against this background, the Commission has repeatedly determined that low power radio stations are inefficient spectrum users. For example, as we discuss in greater depth below, the Commission determined in 1978 that the operation of low powered Class D stations caused substantial inefficiencies in the use of spectrum, and consequently terminated the service. Specifically, and relevant here, it found that the large number of Class D stations were impeding the more efficient services that Class B and C stations could provide, and were

Research Notes, No. 112 (March 1999). Stations operating with budgets greater than or equal to \$2,000,000 obtained less than 10% of their revenue from federal and CPB sources. *Id.*

²¹ Stephen Paul Dunifer, 11 FCC Rcd 718, 722 (1995).

²²See Changes in the Rules Relating to Noncommercial Educational FM Broadcast Stations, Second Report and Order, 69 F.C.C.2d 240 (1978) ("Class D Second Report and Order"); see also Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations, Notice of Inquiry, 3 FCC Rcd. 3664, 3668 (1988) ("Our experience with low-power stations like translators indicates that substantial spectrum inefficiencies may result from their operation on a primary basis.")

hampering the Commission's ability to authorize primary service in a way that best served the public.²³

Similarly, in a proceeding that rejected a proposal to permit FM translator stations to originate programming (the practical equivalent of a low power FM service), the Commission again weighed the interests of the broadcasters who supported program origination against the interests of the listening public, whose ability to receive signals would have been impaired under the proposal. It explained that "our efforts to improve local service must be balanced against the technical degradation to the overall broadcasting system that could result from a proliferation of translator stations." The Commission took as its goal the provision of "FM radio broadcast service in a manner that promotes program diversity while enhancing the incentives for efficient full-service broadcast station development." Ultimately, the Commission determined that "enhancements to the FM service are most efficiently provided by full-service broadcast stations," and declined to permit translator program origination.

Finally, in a recent proceeding assessing a fine against an unlicensed broadcaster, the Commission once again took note of the reality that the value of low power transmissions does not outweigh damage to full power radio listeners. It noted that, even if a low power station were sited at the fringe of a full power station's service contour where the low power station could operate without interference to itself, the low power station would be:

²³ See Class D Second Report and Order, 69 F.C.C.2d at 248-49.

²⁴ Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations, Report and Order, 5 FCC Red 7212, 7219 (1990).

²⁵ Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations, Memorandum Opinion and Order, 8 FCC Rcd 5093, 5097 (1993).

²⁶ *Id.* at 5094.

unacceptable from a public interest standpoint because the low power station would cause objectionable interference to the reception by the audience of the primary station's signal. Such interference to the primary station could be difficult to identify and correct, and would serve to lower the quality of the FM broadcasting service. . . . The Commission, therefore, does not allow low power FM radio broadcasting because it is an inefficient use of the spectrum . . . [and] cannot adequately serve communities and mobile audiences. ²⁷

The Commission also concluded that low power stations preclude "the establishment of more efficient, stable, full power stations" on the same or adjacent channels in the same general area. While the interest of the low power broadcaster might be satisfied by the granting of a low power license, the interest of the public in service may not be, the Commission noted. "Although the preclusive effect of a station increases with power . . . the service radius (and area) increases at a much faster rate. If we treat preclusion as a cost and service as a benefit, the cost/benefit ratio improves with power; but the ratio is very poor for low powered stations." For all these reasons—the technical degradation of the broadcasting system, the inefficient use of the spectrum, and the preclusion of service by more stable full power stations—the Commission has shied away from low power radio.

2. The Considerations Supporting Wide-Area Coverage In The Past Have Greater Weight Today.

The considerations that repeatedly have led the Commission to reject proposals for low power radio are even more compelling today. The spectrum is more crowded now than it has ever been. Currently there are 12,276 licensed commercial and noncommercial radio

²⁷ Stephen Paul Dunifer, 11 FCC Rcd at 724.

²⁸ *Id*.

²⁹ *Id.* at 724-25.

stations in the United States, making it increasingly difficult to find available frequencies and exacerbating the problems of spectrum preclusion.³⁰

At the same time, 61.7% of all radio listening during the work-week takes place outside the home, primarily on automobile receivers.³¹ Thus, a station that cannot cover a fairly extended drive—as would be especially true of 10 and 100 watt stations—will be significantly disadvantaged in its ability to attract and retain an audience. The Notice suggests that 1000 watt LPFM stations will be able to cover 8.8 miles and therefore would be suitable for mobile reception. Although we believe interference problems may well prevent such stations from reaching listeners as much as eight miles out, even a nine mile radius is insufficient to serve mobile listeners when the *average* commute in the United States is almost 12 miles³² and may be expected commonly to start more than nine miles from the transmitter. At the same time, an LPFM station providing service nine miles out could silence the existing public radio reception by commuters coming from outside of the 17-mile protected contour inward.³³

Finally, we believe the same financial realities that would have doomed Class D Radio stations in the Seventies are still at work today, and we see no basis for a shift in the Commission's salutary view that lower power stations cannot provide efficient, viable public radio service.³⁴ The LPFM stations envisioned by the proposal are unlikely to serve enough

³⁰ See FCC News Release, Broadcasting Station Totals as of March 31, 1998 (April 22, 1998).

³¹ See Radio Advertising Bureau, Radio Marketing Guide and Fact Book for Advertisers (1995).

³² See Oak Ridge National Laboratory, Draft Summary of Travel Trends 1995 Nationwide Personal Transportation Survey (Jan. 8, 1999).

³³ A Class A FM station may operate with an ERP up to 6 kilowatts at an HAAT of 100 meters (328 feet), which produces a 60 dBu contour at a distance of 17.4 miles. *See* 47 C.F.R. § 73.211(b).

³⁴ See Class D Second Report and Order, 69 F.C.C.2d at 247.

people, be on the air for enough hours, or be operated by sufficiently experienced licensees to have a significant chance of economic viability. The 1000 watt stations, which will require a sizeable listener base to sustain operations, will probably be available only outside the major markets – in areas where population density will often be too small to yield enough support. The Commission must thus consider whether the LPFM proposal will thwart its objectives of wide-area service, efficient spectrum allocation, and the public's demand for a radio service that can satisfy an increasingly mobile lifestyle.

B. The Supposed Benefits Of An LPFM Service Will Not Outweigh The Actual Harm.

Just as it is unclear from the proposal how noncommercial LPFM stations will be funded, it is unclear how the LPFM stations created will achieve the stated Commission goals. The Commission considers the "increased opportunity for entry, enhanced diversity, and new program services" to be the principal benefits of LPFM.³⁶ It hopes to "provide new entrants the ability to add their voices to the existing mix of political, social, and entertainment programming," particularly if those voices "address special interests shared by residents of geographically compact areas" or express "non-mainstream interests or unconventional views."³⁷

But the Notice does not suggest how the Commission will guarantee that the LPFM stations will be run by, or cater to, populations that currently are underrepresented in radio. As the Commission is well aware, it is constrained in its ability to select licensees on the

³⁵ For example, there currently exist frequencies available for 1000 and 100 watt stations for which prospective licensees have not been able to raise sufficient funds to establish operations.

³⁶ Notice, ¶ 57.

³⁷ Notice, ¶ 12.

basis of their minority status.³⁸ The only mechanism by which the Notice proposes to encourage diversity in new ownership is via a cross-ownership restriction prohibiting owners of full power broadcast stations from owning an LPFM facility.³⁹ This restriction will prevent those with radio experience—including existing minority licensees such as owners of CPB-funded African-American, Latino and Native American stations—from obtaining LPFM licenses, but does nothing to ensure that those from underrepresented communities or those interested in niche programming will obtain the licenses. The Notice also proposes that mutually exclusive applications be decided by auction, decreasing the possibility that the LPFM station at issue will be operated by anyone but the relatively affluent.⁴⁰ As for service to minority populations within urban areas, city airwaves are so heavily congested that, even with the relaxed interference standards the Notice proposes, it is unlikely that many LPFM stations could be shoehorned into the spectrum.⁴¹ Indeed, the service contours of LPFM stations will be determined by the accident of the transmitter location, and they are unlikely to follow the boundaries of identifiable neighborhoods.⁴²

Finally, the ability of listeners to tune in the LPFM stations will be compromised by interference and receiver selectivity limitations and the stations will in many cases find themselves engaged in mutually assured destruction. As discussed below, the LPFM and

³⁸ See Adarand Constructors, Inc. v. Pena, 515 U.S. 200, 227 (1995) (any classification by the Federal government on the basis of race, color, or national origin is automatically suspect, even when that classification is meant to benefit groups that have suffered discrimination in the past; the classification must be narrowly tailored to further a compelling governmental interest).

³⁹ *See* Notice, ¶ 57.

⁴⁰ See id. ¶ 104.

⁴¹ See id. at Appendix D.

⁴² See Class D Second Report and Order, 69 F.C.C.2d at 247.

existing station signals will create interference to each other so that the signals of the larger stations will be less effective and the signals of the smaller stations will be drowned out.

Moreover, today's receivers will have trouble selecting for the new LPFM stations. Thus, LPFM will not accomplish the Commission's goal of diversifying broadcasting viewpoints because listeners will be unable to receive the programs of these small stations.

The fact is that there are technologies other than FM radio that are better suited to reach small, targeted audiences with special interests. These technologies are not crimped by spectrum scarcity or high capital expenditures and can easily be pursued by new entrants. For example, websites like broadcast.com and audionet.com carry streaming audio and video of more than 400 radio stations and networks, numerous Internet-only webcasts, live music concerts and club performances and on-demand special interest shows. More than 2,000 cyber-radio stations, which broadcast solely on the Internet, are already operating world-wide. In addition, wireless services already exist to deliver narrowcast programming through a variety of service providers like AirMedia, Inc. These technologies allow PCS and digital cellular carriers to provide a wireless "push" of broadcast, narrowcast and individualized content to customers. They can aggregate content from a variety of media and broadcast sources, and re-package it in personalized and group broadcasts, including news stories, sports coverage, weather information,

⁴³ See About broadcast.com, www.broadcast.com (visited July 30, 1999).

⁴⁴ See Thomas E. Weber, Web Radio: No Antenna Required, Wall St. J., July 28, 1999, at B1.

⁴⁵ See Press Release, Corporate NarrowCast Product for Wireless Carriers Unveiled by AirMedia, www.airmedia.com/sidebar/corprofile/pubrelations/AMCIS.html (visited July 30, 1999).

⁴⁶ See id.

traffic reports, financial updates and even personal reminders and scheduling assistance.⁴⁷ Using these services, churches, community centers, and local schools can create precisely the specialized programming the Notice has in mind. These services are available to almost 28 million of the approximately 84 million U.S. households that have Internet access. That number rises every day.⁴⁸ The Notice states that Internet technologies are in their infancy and are not a substitute for radio.⁴⁹ While this may be true at the moment, it will not be true several years from now when the proposed LPFM service will still be barely struggling to its feet.

IV. THE PROPOSAL IS NOT TECHNICALLY SOUND.

A. LPFM Will Degrade The Currently Available Radio Service By Introducing Intolerable Interference.

The Notice fails to address sufficiently the harm that LPFM stations could do to the technical quality and reach of existing radio service. According to the Notice, "[r]elaxed interference standards for low power FM stations may be the only way to 'find' sufficient spectrum in medium and larger markets to create any new viable service of 100 watts or more." Although the Notice states optimistically "that creating opportunities for new LPFM service should outweigh any small risks of interference," our studies show that the risks of interference are significant. The consequences of interference could be devastating to public radio—

⁴⁷ See id.

⁴⁸ See Marketer: Transforming Information Into Intelligence, http://www.emarketer.com/ (visited July 30, 1999). The number of on-line households is predicted to grow to 85 million by the year 2002. See id.

⁴⁹ See Notice, \P 12.

⁵⁰ *Id.* ¶ 44.

⁵¹ *Id.* ¶ 45.

including both existing and LPFM stations—as well as to the very type of programming that the Commission hopes to foster.

CPB, National Public Radio ("NPR"), and the Consumer Electronics

Manufacturers Association ("CEMA") conducted an engineering study to investigate how the addition of low power radio stations to the FM dial would affect the ability of listeners to receive noncommercial and other stations (the "CEMA Study"). The CEMA Study, which is being submitted with NPR's comments in this proceeding, considered the effects of the proposal on the selectivity of five automotive, six portable, and five home stereo receivers to determine whether these consumer products would be able to distinguish among more densely packed channels following the creation of an LPFM service. 53

The tests show that, in many situations, adding a new LPFM station by eliminating the 2nd and 3rd adjacent protections would significantly impair both the existing and the new stations. Listeners would encounter dramatically increased hissing and crackling on the frequencies available to them as well as increased unavailability of channels altogether. For example, using a 45 dB signal-to-noise ratio as a target level for *minimum* quality reception for lightly processed formats,⁵⁴ the 2nd adjacent test (B.3.4) showed that the noise increased with the undesired signal and, at -40 dB D/U, was well below the target for quality reception. Thirteen of the sixteen receivers tested had a signal-to-noise ratio below the target; three of these thirteen

⁵² See CEMA, FM Receiver Interference Tests, Laboratory Test Report, July 27, 1999 ("CEMA Study").

⁵³ See CEMA Study, Test A, pp. 1-5.

This figure was established by a previous NPR listening test. *See id.*, Test B, p. 1. Light processing means that the signal contains low-modulated passages, such as classical music or talk radio. The target signal-to-noise ratio for rock stations, which are more densely modulated, is 35 dB.

failed to tune in the desired signal at all.⁵⁵ Similarly, the 3rd adjacent test (B.4.3) showed that the noise increased with the undesired signal, and in some cases caused the receivers to fail. At -30 dB D/U, the average signal-to-noise ratio was below target at 42 dB.⁵⁶

The results of the 2nd and 3rd adjacent tests were recorded on DAT tape and transferred to CDs, so that the Commission could hear the interference firsthand. These CDs are being submitted with NPR's comments. For all of the 2nd adjacent subjective tests, the undesired signal was modulated with processed rock music, while the desired signal was modulated with classical music. The test then was repeated with densely modulated rock music on the desired signal. For the 3rd adjacent subjective test, the desired signal was modulated with classical music. Each of the recordings also includes a segment without interference against which the results can be compared.⁵⁷ These CDs show that interference will be very apparent on stations broadcasting classical, jazz, talk or other lightly processed formats.

Interference will be further exacerbated by the elimination of taboos, as proposed in the Notice. Under the Commission's present rules, stations that are operating in areas where two strong stations are separated by 10.7 MHz +/- 100 kHz are protected from interference by taboos. The CEMA Study (Tests D.1 and D.2) shows that this spacing has minimized intermodulation and local oscillator interference. The proposal to drop these taboos – to place signals on channels which were not available for use under the taboo assumptions – will make most receivers susceptible to serious interference by those new signals. If the LPFM proposal is

⁵⁵ See id., Test B, p. 4; Appendix B, p. 3.

⁵⁶ See id., pp. 6-7; Appendix B, p. 4.

⁵⁷ See id., p. 5-6.

⁵⁸ See 47 C.F.R. § 73.207.

adopted, in short, the majority of receivers will have difficulty discriminating between desired and undesired signals.⁵⁹

The results of these studies are not surprising. The Commission's past experience with low power radio service shows that the interference caused by low power stations outweighs the benefits that they confer. Until 1978, the Commission permitted Class D FM noncommercial educational stations broadcasting at 10 watts or less to be licensed in the 88.1 to 99.9 MHz part of the FM band. These stations were intended to service limited areas, such as a college campus. 60 The Commission determined that the continued authorization of Class D stations hindered the provision of noncommercial radio service to underserved areas by blocking spectrum that could be used by higher powered stations. It described the interference caused by Class D stations as "a dime on a table, representing a Class D station's service area, which prevents a round circle of paper, representing a larger service area, from sitting flat on the same table."61 In many sparsely settled areas, the Commission found, high powered stations represent the only way to reach potential listeners, 62 while in more densely populated areas, a Class D station's signal might not necessarily be congruent with the neighborhood that it intends to serve. 63 Although Class D stations in some cases provided "truly local service," 64 the Commission concluded, "[i]t has become clear that these low power operations cannot be

⁵⁹ See CEMA Study, Test D, pp. 1-2.

⁶⁰ See Class D Second Report and Order, 69 F.C.C.2d at 244.

⁶¹ http://www.fcc.gov/mmb/asd/bickel/d-aside.html (visited July 30, 1999).

⁶² See Changes in the Rules Relating to Noncommercial Educational FM Broadcast Stations, Memorandum Opinion and Order, 70 F.C.C.2d 972, 978 (1979).

⁶³ See Class D Second Report and Order, 69 F.C.C.2d at 247.

⁶⁴ *Id*.

permitted to function in a manner which defeats the opportunity for other more efficient operations which could serve larger areas, and bring effective noncommercial educational radio service to many who now lack it."65

Similarly, LPFM stations may well prevent already existing stations from reaching their audiences, particularly beyond the protected contour. At the same time, LPFM stations will find it difficult to build an audience because of the correlative interference to their own signals. As the CEMA Study shows, both the existing signal and the newly introduced signal will be impaired by short spacing and the elimination of taboos. If the Commission adopts its proposal to shut down newly licensed 10 and 100 watt stations if they turn out to cause actual impermissible interference, ⁶⁶ as per the likely large number of interference complaints we believe the new standards will engender, LPFM will create an enormous administrative burden for the FCC, as well as for existing licensees who will be required to bring the interference to the Commission's attention and participate in the administrative proceedings these complaints will occasion. And in the interim period during which both stations continue to operate and to interfere with one another, LPFM will reduce the number of listeners who will be able to receive a clear public radio signal.

B. To Receive LPFM Stations, Listeners Will Have To Replace Existing Radios With More Expensive Equipment.

The public will, we think, reap very little benefit from the destruction of existing service, because it will not be able to receive many of the newly added LPFM stations on existing equipment. Receiver manufacturers assume that all stations have co-, 1st, 2nd, and 3rd

⁶⁵ *Id.* at 248-49.

⁶⁶ See Notice, ¶ 90.

adjacent channel contour protections and radios have been constructed with that selectivity in mind. They are not designed to distinguish among more closely packed channels. As the CEMA receiver tests show, the proposed elimination of 2nd and 3rd adjacent channel protections⁶⁷ will confuse existing receivers, and prevent listeners from receiving these radio stations clearly. The tests indicate that some receivers will fail to pick up any intelligible signal at all.⁶⁸ Thus, listeners will be forced to buy more expensive equipment designed to distinguish between closely packed channels in order to receive a given radio signal.⁶⁹

C. The Proposal Will Be Particularly Detrimental To Noncommercial Stations.

The interference that LPFM will introduce will be particularly harmful for noncommercial stations because of the type of programming existing public stations tend to provide and their reliance on translators to transmit their signals outside of the city centers.

The formats of noncommercial radio programs are more sensitive to interference than are the programs that most commercial stations carry. More than half of public radio stations broadcast classical, jazz, folk, and world music formats, as well as news and other talk radio. For example, in 1996, classical music made up 34% of weekly public radio broadcasts, followed by news and information at 29%, and jazz at 16%. The robust nature of talk radio, classical music, and jazz is particularly vulnerable to interference because of its light

⁶⁷ See id. ¶¶ 43-50.

⁶⁸ See CEMA Study, Test B; Appendix B.

⁶⁹ This would be an unfortunate result for a service designed to reach the underserved and underrepresented, a population that traditionally is economically disadvantaged. *See, e.g.*, U.S. Census Bureau, Poverty 1995, at http://www.census.gov/hhes/poverty/pov95/povrac95.html (visited July 30, 1999).

⁷⁰ See CPB Research Notes, No. 105 (Nov. 1997).

processing.⁷¹ The CDs NPR is submitting with its comments demonstrate what a radio program broadcast by a station without 2nd and 3rd adjacent protections will sound like on different types of receivers. These recordings show that LPFM stations will produce a broadcast service that cannot be received clearly by most existing radios, particularly if the signal is lightly processed, as in the case of classical music or jazz. ⁷²

Far more than commercial stations, many public radio stations rely on translators in order to relay their signals to audience members in remote locations. For example, at the time of the last census, over nine million people received a CPB-funded public radio signal through translator stations, and a significant portion of those listeners could not receive the signal of a primary station. Translators are particularly susceptible to interference because of their low power output, and will suffer if an LPFM station is introduced into nearby frequencies. The Commission has stated that the proposed 1000-watt primary LPFM service would not be required to protect FM translator and booster-stations from interference. Additionally, under the Commission's current rules, an FM translator station is shut down if it causes actual interference to any authorized broadcast station or the off-the-air signals of secondary noncommercial educational FM stations.

⁷¹ See, e.g., CEMA Study, Test B, p. 6.

⁷² See id.; see also Appendix B, pp. 5-11.

⁷³ See Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations, Report and Order, 5 FCC Red. 7212, 7213 (1990).

⁷⁴ See Corporation for Public Broadcasting, Network Report, Census of Population and Housing (1990).

⁷⁵ See Notice, ¶ 27 n.37.

⁷⁶ See 47 C.F.R. § 74.1203.

stations that are so vital to reaching remote public radio audiences would be displaced by the introduction of an LPFM station that may not be able to reach the same audience.

V. CONCLUSION.

CPB cannot support the proposal to introduce LPFM stations into the noncommercial part of the FM band. This plan will only serve to frustrate the goal of universal service by creating intolerable interference to both the low power and full power service. Public radio will be particularly damaged by this interference because of the impact on the translator stations used by many public radio stations to reach their audiences; the vulnerability of talk, jazz, and classical formats to interference; and the way that the noncommercial band is assigned. If established public radio stations cannot reach all the listeners that now form their membership base, and new stations are not widely enough received to establish a solid listenership, interference will undermine the funding and the future of noncommercial radio and its service to the American public.

For the foregoing reasons, CPB urges the Commission to reject the LPFM

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Local Programming

Public television and radio stations devote a substantial portion of their resources to create and broadcast programs to meet the needs of their local communities. Unlike commercial stations, which engage in local production to the extent that they can sell it to advertisers, public stations create local programs in order to meet community needs. They are often guided in this process by the advice and suggestions of a Community Advisory Board that includes representatives of all ethnic and racial groups living in a station's service area.

The following state-by-state snapshot of activities and programs undertaken by local public broadcasters to serve the diverse audiences in their communities provides some excellent examples of the kinds of efforts pursued by public radio and television licensees to serve and enrich their communities. It is not a definitive guide to such efforts and is by no means exhaustive, either in its listing of stations providing such services or in its descriptions of the programs and services provided by any one station to minority and diverse audiences.

Alabama

Alabama Public Television works with minority and disadvantaged children through a partnership between its Ready to Learn program and the state EvenStart and Early Intervention programs.

WBHM-FM, Birmingham provides the Alabama Radio Reading Service, which is broadcast statewide over public radio stations and the SAP channel of Alabama Public Television.

WJAB-FM, Huntsville produces a weekly minority issues program titled Different Perspectives.

WLRH-FM, Huntsville offers cultural programming targeting African-American, Irish and Native American listeners.

WLJS-FM, Jacksonville airs spot announcements concerning minority activities and carries special programs during Black History Month.

WVAS-FM, Montgomery is licensed to Alabama State University, a historically black institution of higher learning. Last year the station sponsored a Welfare Reform Forum with local churches and took its news/talk show on the road for a re-enactment of the historic Selma to Montgomery Voting Rights March.

WUAL-FM, Tuscaloosa produced an in-depth series of reports on the growing Hispanic population in north Alabama.

Alaska

KAKM-TV, Anchorage regularly airs Heartbeat Alaska, a weekly program aimed at Alaska's Native American community.

KNBA-FM, Anchorage developed and implemented Native Word of the Day, a 90-second program that features a Native American word in four Native languages.

KSKA-FM, Anchorage provides opportunities on its sub-carrier channel for local Korean language broadcasts, and this year offered a new Spanish language interview program.

KBRW-AM, Barrow serves an audience that is almost three-quarters Inupiaq Eskimos; Inupiaq language and cultural programming is a top priority. The station constructed an Inupiaq programming studio and archive library, which features state of the art recording and production equipment designed to keep the sound of the Inupiaq language rich and clear for many years to come.

KYUK-AM, **Bethel** is a bilingual station, producing local programming in both English and the Yup'ik Eskimo Language.

KYUK-TV, Bethel broadcasts local programming designed to meet the needs of the mostly Native American population of its viewing area.

KCUK-FM, Chevak regularly broadcasts in the Southwestern Eskimo Cup'ik/Yup'ik language and English.

KDLG-AM, Dillingham serves a predominately Yupik Eskimo audience, and translates several programs into Yupik.

KUAC-FM, Fairbanks airs a weekly interview program that regularly addresses issues of interest to diverse audiences. The station also produces and broadcasts regular music programs featuring jazz, rap, and blues, and airs a weekly Spanish language program.

KUAC-TV, Fairbanks assembled and distributed a thirteen-part anthology of programming entitled *Polar Vision*, which focuses on Native American life in Alaska and Siberia.

KZPA-AM, Fort Yukon regularly broadcasts programs in the Gwitchen languages for local Native audiences.

KIYU-AM, Galena produces a weekly one hour health and safety public affairs program that is broadcast both in the Athabascan language and in English.

KHNS-FM, Haines produces *The Wellness Circle*, a program that utilizes a Native American approach to discussing both Native and community issues.

KBBI-AM, Homer funds and provides studio facilities for the production of *Different Drums*, a weekly, nationally-distributed magazine show featuring contemporary Native American artists and musicians.

KTOO-FM, Juneau produces local programming addressing Native Americans, Hispanics, children and seniors.

KTOO-TV, Juneau, along with two other public television stations, has been awarded production funding from the U.S. Department of Housing and Urban Development. The project will create a meaningful training and employment program for Alaska Natives.

KRBD-FM, Ketchican airs the weekly call-in program Native America Calling.

KMXT-FM, Kodiak offers weekly programming in both Tagalog and Spanish for the Filipino and Hispanic communities.

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KOTZ-AM, Kotzebue serves an 85 percent Eskimo audience with a variety of locally produced programming.

KSKO-AM, McGrath keeps a finger on the pulse of community needs by sending its staff out into local communities to talk one on one with minority and community leaders.

KFSK-FM, Petersburg, a small station hit hard by funding cuts, makes it a priority to maintain community contact.

KDSP-AM, Sand Point serves a remote rural audience, which is mostly Native American, by providing practical information on nutrition, drug and alcohol abuse and other health and family issues.

KCAL-FM, Sitka serves more than a dozen remote Native villages through a series of translators. The station supported the production of Alaska Natives in Science and Alaska Women in Science, which have received high praise for focusing on the concerns of Native people.

KUHN-FM, Saint Paul Island provides the only radio service to a remote Native American community in the Bering Sea.

KTNA-FM, Talkeetna offers a variety of programming to serve its rural Native American listeners, including call-in programs focusing on Native issues.

KNSA-AM, Unalakleet provides news, information and features to a listening audience that is 95 percent Native American.

KIAL-AM, Unalaska covers local tribal events on its news programs.

KCHU-AM, Valdez broadcasts a daily native news program.

KSTK-FM, Wrangell airs National Native News twice daily.

American Samoa

KVZK-TV, **Pago Pago** provides coverage of the cultural and community activities of many of Samoa's ethnic groups.

Arizona

KNAU-FM, Flagstaff produced an investigation of racial relations along reservation borders entitled *Edge of the Rez* that won several prestigious awards including the Scripps-Howard Award for Journalistic Excellence.

KAET-TV, Phoenix produces a nightly public affairs program which regularly reports on issues of particular interest to Arizona's minority communities.

KUAT-TV, Tucson produces a weekly bilingual news magazine that addresses issues of interest to the Hispanic community.

KUAZ-FM, Tucson produces and airs the weekly Spanish language public affairs program Radio Universidad.

KXCI-FM, Tucson broadcasts four hours of Spanish language programming per week as well as regular programs in Vietnamese and Tohono O'Odham-English dialect.

KNNB-FM, Whiteriver is located on the Fort Apache Indian reservation and broadcasts seventy-five percent of its programming in the Apache language.

KAWC-AM, Yuma is the only local radio station that offers weekly bilingual and Spanish language programming, including news and public affairs.

Arkansas

The Arkansas Network airs Spanish language programming as well as several English as a second language telecourses.

KUAF-FM, Fayetteville is producing a series focusing on the various ethnic groups living in the Arkansas Ozarks.

KASU-FM, Jonesboro regularly covers issues of interest to minority communities in its news and public affairs programs.

California

KHSU-FM, Arcata produces a weekly bilingual Latin music program.

KPFA-FM, Berkeley offers people of color training opportunities in radio production through its apprenticeship program.

KEET-TV, Eureka participated in the First Book program, providing books and literacy activities to local groups working with low income children, including the Hmong Literacy Project and the Indian Action Council.

KSJV-FM, Fresno directs all its programming to minority audiences. The station broadcasts in Spanish, English, Hmong and Mixteco.

KVPR-FM, Fresno promotes local adult and juvenile literacy programs.

KVPT-TV, Fresno airs *GED* on *TV* and uses its Ready to Learn outreach project to train parents and care givers of preschoolers from low-income groups, including migrant workers.

KOCE-TV, Huntington Beach initiated *Hear and Now*, a 24-hour reading service for the visually impaired.

KLON-FM, Long Beach produces the Second Set feature which spotlights community events and projects including interviews with diverse community event organizers.

KCET-TV, Los Angeles spearheaded a unique outreach program, Finding the Power. The goals of Finding The Power are to motivate teenaged Asian-Americans, Pacific Islanders and Latinos to reduce their use of tobacco.

KLCS-TV, Los Angeles broadcasts one hour of English as a second language instructional programming daily.

KPFK-FM, Los Angeles produces news and community affairs programs which address the diversity of Los Angeles.

KUSC-FM, Los Angeles, a classical music station, produces *Gone Global*, a weekly program that focuses on music from around the world.

KVMR-FM, Nevada City features a monthly program called *Disability Rap*, which focuses on disability issues, current legislative activity, and local events that serve the disabled community.

KPCC-FM, Pasadena covers topics of interest to local minority communities during its four hours of daily live call-in programming.

KZYX-FM, Philo worked in conjunction with area schools to air program modules that were written and produced by students during Black History Month.

KMUD-FM, Redway broadcasts a music and information magazine for an Hispanic audience.

KRCB-FM, Rohnert Park, in conjunction with Will The Circle Be Unbroken, the national documentary on the civil rights movement, produced 26 companion oral histories from local residents discussing their experiences in the Civil Rights movement.

KRCB-TV, Rohnert Park airs GED on TV in Spanish, and distributes free Spanish and English workbooks to accompany the series.

KVIE-TV, Sacramento provides a program service designed to meet the needs of its diverse audience, including local current affairs and political coverage.

KVCR-FM, San Bernardino airs weekly music and public affairs programming targeted to black and Hispanic audiences.

KVCR-TV, San Bernardino produces Impacto, a bilingual public affairs program for the Hispanic community.

KPBS-FM, San Diego aired a series of news reports and programs dealing with the controversy surrounding California Proposition 209, the abolishment of California affirmative action laws.

KPBS-TV, San Diego produces documentaries and public affairs programming addressing issues of interest to local minority communities.

KALW-FM, San Francisco produces the program Your Legal Rights, which focuses each week on a particular facet of the law and how it affects individuals. Recent shows have featured immigration and nationality law, workers rights, and how to deal with landlords - all topics that are of particular interest to the many recent immigrants to the San Francisco Bay Area.

KQED-FM, San Francisco produced a year long series of specials which focused on ethnic and cultural diversity in the San Francisco Bay Area.

KQED-TV, San Francisco produced *The Hidden Cities of San Francisco*, which was aired in English, Spanish and Cantonese.

KTEH-TV, San Jose produces the Emmy award winning series Real Science, which looks at minorities who have pursued careers in the sciences and is designed to encourage middle school students to consider careers in science. The station also developed a bilingual training workshop for daycare providers addressing issues of diversity and racism in childcare.

KCSM-FM, San Mateo presents a public affairs program which frequently addresses issues of racism and integration.

KCSM-TV, San Mateo produced two programs in the *New American* series, including *Raymond's Portrait*, which tells the story of a young Chinese American man who graduates from high school despite having Down Syndrome.

KUSP-FM, Santa Cruz regularly broadcasts music and public affairs programming in Spanish.

KCRW-FM, Santa Monica regularly produces public affairs programming on immigration issues, and recorded thirteen hours of Korean short stories, produced with Asian-American actors and direction.

KBBF-FM, Santa Rosa provides bilingual news and information services to thousands of low-income, limited English-speaking people.

KUOP-FM, Stockton broadcasts one hour a week of French language programming.

Colorado

KRZA-FM, Alamosa airs Hispanic cultural, music and public affairs programming.

KAJX-FM, Aspen produces a Spanish language Latino music program.

KGNU-FM, Boulder produces the weekly program Disability Worldwide, which examines a wide range of issues facing people with disabilities.

KBDI-TV, Broomfield premiered Colorado Inside Out Live, a live call-in public affairs program addressing such issues as race relations and bilingual education.

KDNK-FM, Carbondale airs Spanish language programming and sponsors an annual Latino festival.

KCFR-FM, Denver produces and airs statewide news that consistently addresses issues relevant to the minority communities in Colorado.

KRMA-TV, Denver aired several local productions addressing the concerns of minority communities, including *Our Heritage*, a fifteen-part series of two minute programs which highlight the accomplishments and history of Native Americans, Hispanics and African-Americans and their contributions to the State of Colorado, and *When Families Can't Fix It*, a documentary examining the lives of families living with children with severe developmental delays.

KVNF-FM, Paonia broadcasts news, cultural and public affairs programming in Spanish.

KTSC-TV, Pueblo produced Horizons in Health, a mini-series of medical programs for the Native American population.

KOTO-FM, Telluride initiated a Spanish language music and culture program.

Services: Local Programming

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Connecticut

The Connecticut Network produced and presented Young Voices on Sheff vs. O'Neill, a discussion by young people of the court decision introducing integration to the Connecticut school system.

WHUS-FM, Storrs provides public access radio training programs.

Washington, DC

WAMU-FM, Washington produces Metro Connection, a weekly community affairs program which specifically focuses on issues involving the many diverse segments of the greater Washington area.

WETA-TV, Washington, in partnership with the Discovery Creek Children's Museum of Washington, initiated a project to help fourth and fifth graders from a dozen urban public schools participate in an international science education project which uses the Internet for communication between classrooms and sharing data.

WHMM-TV, Washington produces and airs Evening Exchange, a community-based weekly news analysis from an African-American perspective.

WPFW-FM, Washington gears most of its programming toward African-Americans, who comprise the majority of its listeners; programs are also designed specifically for Asian, Haitian, Caribbean, and African communities.

Florida

WBCC-TV, Cocoa broadcast Afro-American Role Models, a series of career guidance programs featuring African-Americans in a variety of careers.

WCEU-TV, Daytona Beach has allied itself with Bethune Cookman-College, a four-year traditionally black institution, to provide internships for students who are interested in communications as a career.

WGCU-FM, Fort Myers regularly schedules works and performances by African-Americans and Hispanics.

WQCS-FM, Fort Pierce broadcasts numerous public affairs reports on minority issues, including immigration reform, mobile clinic health care for the poor and a National Guard program targeted at keeping minority youngsters in school.

WUFT-FM. Gainesville presents a number of community needs forums every year focusing on issues of diversity.

WUFT-TV, Gainesville produces and airs a public affairs program, North Florida Journal, which addresses many issues concerning the needs of minority audiences, including economic development of east Gainesville, job training, and the effects of welfare reform.

WJCT-TV, Jacksonville partnered with community organizations such as the Museum of Science and History to promote African-American Artists in the Community and the internationally known WJCT Jacksonville Jazz Festival.

WDNA-FM, Miami broadcasts programs in English, Spanish, French, Haitlan Creole, and Urdu.

WLRN-TV, Miami devotes six hours a week to Hispanic programming, and also features Brazilian, Haitian and Hindi programming.

WLRN-FM, Miami serves Haitian Creole speakers in South Florida by offering a daily Creole program block.

WPBT-TV, Miami relies on the involvement of its Community Advisory Committee to provide feedback on programming activities. The committee is racially and ethnically mixed and covers a broad demographic range.

WUCF-FM, Orlando produces a weekly talk show that focuses on diversity issues within the community.

WMFE-FM, Orlando airs Latino USA, a news magazine program designed for the Hispanic community.

WMFE-TV, Orlando produced and broadcast specials on preschool education and gangs, English as a second language, and migrant workers in central Florida.

WKGC-FM, Panama City broadcasts public affairs programming concerning adult literacy and those for whom English is a second language.

WUWF-FM, Pensacola produced a four-part educational series discussing African-American's contributions to American music and distributed teacher's guides to local schools.

WSRE-TV, Pensacola produces Aware, a live monthly call-in program that focuses on issues, concerns and events within the minority communities of Northwest Florida.

WFSU-TV, Tallahassee produces Your Voice, a talk show series on minority issues.

WEDU-TV, Tampa produced the prime time Dialogue special on rebuilding trust in Saint Petersburg following racial violence.

WMNF-FM, Tampa was awarded the Dr. Martin Luther King Drum Major Corporate Award for Human Rights from the National Conference of Christians and Jews for its service to the African-American community.

WUSF-FM, Tampa mainstreams its programming for diverse audiences. Within the context of its music programming the station regularly airs works and performances by African-Americans and Hispanics.

WXEL-FM, West Palm Beach airs significant social service coverage of minority organizations and issues.

Georgia

Georgia Public Television co-produced Witchcatcher, an unusual program about an ancient healer in the African-American community. The network also produces a community service series called Success Track focusing on employment-readiness issues.

Services: Local Programming

WUGA-FM, Athens supports a local English as a second language service with on-air coverage and by providing production services for course materials.

WABE-FM, Atlanta produced and aired four concert programs as the African-American Music Series.

WRFG-FM, Atlanta provides programming to the Latin, Asian and African communities in native languages along with English interpretations.

WCLK-FM, Atlanta provides bulletin services which the Jamaican and Hispanic populations of Atlanta rely on for dissemination of community news.

WPBA-TV, Atlanta launched a daily, hour-long series entitled Mind Busters. The program is a live, interactive television program designed to aid students, especially African-American middle schoolers, with their homework.

WJSP-FM, Columbus places a special emphasis in its public affairs programming on the political, educational and cultural issues relevant to the large and varied African-American communities within its listening area.

WSVH-FM, Savannah broadcast numerous special programs in commemoration of Black History Month.

Guam

KGTF-TV, Agana produces the Filipino cultural program Buhay Pinoy. The station also broadcasts Let's Learn Chamorro, a series designed to preserve and foster the Chamorro language along with the culture's traditions, arts and history.

KPRG-FM, Mangilao produces Mandarin Chinese language programming which highlights Chinese literature, music, and history.

Hawaii

Hawaii Public Television partnered with Pacific Islanders in Communications in producing and presenting a series of Pacific Islander Portraits. The network also features the many cultures of Hawaii on its Spectrum Hawaii series.

KHPR-FM, Honolulu broadcasts Ke Aolama (News in Hawaiian), Hawaiian Sunday (Hawaiian Music), Hawaiian Word of the Day (English/Hawaiian), and several other programs targeted to the Native Hawaiian population.

<u>Idaho</u>

Idaho Public Television produced a special hour-long Dialogue in conjunction with the national series on campus prejudice, Skin Deep. The special featured students from regional universities interviewing their peers on racial attitudes.

KBSU-FM, Boise provides Spanish language news, music and public affairs programming on a daily basis.

Illinois

WSIU-FM, Carbondale produces regular reports devoted to minority issues, including special features which air during Black History Month.

WSIU-TV, Carbondale aired twenty programs, four of which were produced locally, in celebration of Black History Month, and participated with fourteen programs and outreach activities for Hispanic Heritage month.

WEFT-FM, Champaign airs three locally-produced public affairs programs that involve issues of interest to the African-American community, and offers a Latino music program in Spanish.

WEIU-TV, Charleston addressed the needs of minority and other diverse audiences through its two weekly local public affairs programs.

WBEZ-FM, Chicago completed another of its annual "Chicago Matters" projects, this one focusing on work. The project included thirty essays, six documentaries and thirty feature reports, which addressed the subject of work in Chicago. Projects in past years have focused on subject matters such as race, violence, immigration, aging and work.

WTTW-TV, Chicago features minority and diverse artists in its program Artheat Chicago. Featured artists include: The Mexican Fine Arts Center, The Black Ensemble Theater, Muntu Dance Theater (African dance), Access to the World of Dance (dancers in wheelchairs) and neighborhood tours featuring the diverse cultures of Chicago.

WYCC-TV, Chicago, in collaboration with City Colleges of Chicago, produced a special series of one minute vignettes entitled *Project Opportunity*. The series heralded the success of former welfare recipients who, through a special educational and mentoring program, were able to obtain jobs and get off of welfare.

WSIE-FM, Edwardsville offers a format based on jazz music that is designed to appeal to an African-American audience. In keeping with its format, the station produces a daily Today in Black History feature during Black History Month.

WDCB-FM, Glen Ellyn continues its strong alliance to the English as a second language and GED programs at its licensee, the College of DuPage. These programs, among the largest in the Chicago area, are growing, in part, due to the exposure provided by the station.

WIUM-FM, Macomb operates a radio reading service which records class materials for blind and print disabled students and provides training and experience for a developmentally disabled clientele.

WMEC-TV, Macomb participates in the First Book program, which distributes books to minority and low-income children in its viewing area.

WCBU-FM Peoria produced several dramatic readings of Dr. Martin Luther King's speeches that aired throughout the King holiday.

WTVP-TV, Peoria expanded its Ready to Learn service in Central Illinois. The main targets of the training workshops thus far have been childcare providers and parents of preschool and primary school children in lower-income, inner-city, or "at risk" programs.

WQUB-FM, Quincy produced numerous local public affairs programs on minority issues.

WVIK-FM, Rock Island airs news and public affairs programming that is specifically designed to provide insight into the needs of minority and diverse audiences.

WILL-FM, Urbana broadcast the program The Carving of Crazy Horse Mountain, a tribute to the Lakota warrior Crazy Horse, and airs Latino USA on a regular basis.

WILL-TV, Urbana presented Against the Wind, a local production of particular interest to the disabled. The documentary profiled the remarkable career of wheelchair racer and Boston Marathon winner Jean Driscoll, and also featured the unique program for wheelchair athletes developed by the University of Illinois.

<u>Indiana</u>

WFIU-FM, Bloomington airs a weekly one-hour public affairs program that regularly covers topics of interest to disabled people, older Americans, and minority audiences.

WTIU-TV, Bloomington worked to respond to escalating racial tensions on its host university's campus. The station developed a campus-based outreach program to extend the value of the nationally-distributed documentary *Skin Deep* and to localize its lessons. A videotaped discussion among student leaders was paired with the documentary for broadcast on the campus cable system to residence halls and classrooms.

WNIN-FM, Evansville broadcasts local news coverage of a variety of topics such as race-relations, and handicapped and elderly care.

WNIN-TV, Evansville, in response to an influx of Japanese residents working at the area's Toyota plant, is working a with local businesses and community organizations to produce a local program designed to educate the community about Japanese culture.

WBNI-FM, Fort Wayne distributed 2,500 copies of its *Black History* brochure to area schools, libraries, and churches. The brochure contains information about local and national programming aired in celebration of Black History Month, including a rebroadcast of a local community-wide Dr. Martin Luther King, Jr. Memorial Service.

WFWA-TV, Fort Wayne broadcast GED ON TV, enabling students to receive their high school equivalency diploma.

WFYI-TV, Indianapolis successfully used its radio reading service for the print-impaired to supplement a tutoring project for adult new readers.

WTBU-TV, Indianapolis broadcasts local news, culture and events for the Hispanic population in Indianapolis, and airs international news in Spanish.

WIPB-TV, Muncie produces a series of childcare programs which are aired in both English and Spanish.

WNIT-TV, South Bend is a founding member of a working group to address issues important to recent immigrants.

WVUB-FM, Vincennes broadcasts approximately fifteen public service announcements per week targeted toward advising illiterate adults in Knox county about a literacy program operated by the local public library.

WBAA-FM, West Lafayette worked with an African-American independent producer to prepare and broadcast a series of nineteen half-hour programs dealing with diversity issues. The programs featured discussions with minority leaders in the community covering a wide variety of topics including racism, discrimination and efforts to increase understanding between diverse racial and ethnic communities.

lowa

Iowa Public Television produces Student Voices, a monthly series that addresses issues important to Iowa's student population. The program regularly addresses the concerns of minority students.

WOI-FM, Ames co-sponsored a conference on the needs of the homeless, for which National Public Radio personality Ray Suarez was the principal speaker. The station worked with a number of Hispanic community organizations to increase awareness of the conference.

KUNI-FM Cedar Falls uses its own award-winning news staff to provide a local examination of the diversity issues addressed in national programs such as All Things Considered and Morning Edition.

KCCK-FM, Cedar Rapids provided special public affairs and music programs for Black History Month. Black Radio: Telling It Like It Was and Harlem Hit Parade were among the programs broadcast.

KIWR-FM, Council Bluffs features River Currents, a weekly program which addresses various issues which affect its listeners. Some of the topics covered include the NAACP, Black History Month, and the Museo Latino.

KSUI-FM, Iowa City makes a special efforts to identify, acquire, produce and broadcast high-quality programming by, for, and about under-represented groups.

KWIT-FM, Sioux City produces a weekly Spanish language music program, South of the Border. Various community agencies work with the station to provide information of interest to the Spanish speaking community.

KBBG-FM, Waterloo, an African-American controlled station, provides information for the African-American residents of Northeast Iowa.

Kansas

KANU-FM, Lawrence produces fifteen to twenty local stories a year specifically related to minority issues, including an award-winning two-part series on the treatment of Asian-Americans in western Kansas.

KKSU-AM, Manhattan produces and broadcasts a weekly feature entitled *Diversity*, which spotlights issues and people at Kansas State University and in the state of Kansas.

KANZ-FM, Garden City broadcasts three hours per week of Spanish language programming, including practical information about immigration law and taxes.

KMUW-FM, Wichita airs a variety of culturally diverse music programs such as gospel, Tex-Mex, Hispanic, and Afro-Caribbean.

KPTS-TV, Wichita conducts regular member surveys and uses its community advisory board to help ascertain and meet the needs of minority and other diverse audiences.

Kentucky

Kentucky Educational Television, through its participation in the First Books program, provides books to minority and economically disadvantaged families, including migrant farm workers.

WNKU-FM, Highland Heights produces a weekly public affairs call-in program, Speaking Frankly, and the weekly music and culture programs Caribbean Expressions and Deutsche Ecke, all of which serve diverse audiences.

WUKY-FM, Lexington devotes a substantial portion of its broadcast time to jazz and blues, and actively promotes a jazz concert series sponsored by the University of Kentucky Office of African-American affairs.

WFPK-FM, Louisville ascertains the needs of its minority audience by remaining in regular contact with the local nonprofit groups and agencies that serve these groups.

WKMS-FM, Murray produced 50 Moments of Western Kentucky Black History, which were aired throughout its programming day. These bits of information about how black Americans have fared in Western Kentucky since they arrived with other pioneers were researched by students and faculty using community resources and the academic holdings of Murray State University.

WEKU-FM, Richmond uses its local news department to follow breaking stories involving minority and other diverse audiences.

WMMT-FM, Whitesburg broadcasts the only locally-originated rap/hip-hop programming in its area. More traditional minority culture is reflected in the annual broadcasts of the Seedtime on the Cumberland festival of traditional mountain arts, which includes African-American and Native American performers.

Louisiana

Louisiana Public Broadcasting held a number of workshops for parents of physically challenged, hearing impaired and English as a second language children.

WBRH-FM, Baton Rouge carries a program schedule which is designed to be symbolic of Louisiana's African-American culture and heritage.

KSLU-FM, Hammond features locally-produced blues and rap music programs on a weekly basis.

KRVS-FM, Lafayette broadcasts Cajun and Creole music announced in the French language 28 hours per week.

KEDM-FM, Monroe airs Creole Statement, a weekly, locally-produced show exploring Creole, Cajun, and Mississippi Delta music, artists, and themes.

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WLAE-TV, New Orleans works closely with historically black universities in its area.

WWNO-FM, New Orleans broadcasts locally produced arts reports profiling artists and arts groups representing a wide variety of cultural and ethnic groups.

WWOZ-FM, New Orleans offers diverse programming with a heavy focus on contemporary and traditional jazz, blues, Orleans rhythm and blues and specialty programs such as Tiene Sabor (Latin), Tudo Bem (Brazilian), The Irish Show, and The Caribbean/African Journey.

KDAQ-FM, Shreveport has made promoting literacy a priority through various on-air and community outreach projects.

Maine

Maine Public Broadcasting (television) addressed the perspectives and special problems of new immigrants in its production *Red Maine*, a series about issues of importance to rural Maine. Its Ready to Learn project conducted special training for childcare providers caring for migrant children.

Maine Public Radio, through its Maine Citizens Campaign, explored various facets of life in a typical southern Maine community, with a special emphasis on issues important to minorities and new immigrants.

WERU-FM, Blue Hill Falls regularly works with local literacy organizations to help connect illiterate adults with literacy volunteers. The station also regularly broadcasts Native American programming.

WMPG-FM, Portland is located in one of a handful of U.S. cities designated for refugee resettlement by the United Nations. Much of the station's programming is geared toward these new Americans and is often produced by them. Programming includes Eastern European, Middle Eastern, Cambodian, African, Caribbean, Jewish, Latino and Irish music and information programs.

Maryland

Maryland Public Television developed My Country, a series of profiles of individuals affected by the Americans with Disabilities Act.

WBJC-FM, Baltimore broadcasts a Russian language news and information service and a radio reading service on its two supplemental SCA frequencies.

WJHU-FM, Baltimore devotes considerable time on its local public affairs programming to addressing minority needs and problems.

WESM-FM, Princess Anne, located on a historically black college campus, rebroadcasts lectures, seminars, and speeches from news makers, educators and scholars visiting the university.

Massachusetts

WFCR-FM, Amherst broadcasts *Tertulia*, a weekly four-hour program of news and music in Spanish.

WBUR-FM, Boston produces Con Salsa, a weekly five-hour program featuring music of particular interest to Spanish-speaking people in the area that also serves as a voice for community event information.

WGBH-FM, Boston produces and broadcasts Sound & Spirit, a weekly cultural documentary that explores the universal questions confronting all people. It connects cultures and generations, drawing on music and religions from all parts of the world.

WGBH-TV, Boston produces a weekly series, Basic Black, designed to highlight stories of the black community in Boston. The series La Plaza, featuring programs reflecting the Latino community, is now in its 19th year of service. The CPB/WGBH National Center for Accessible Media continues to make media more accessible for blind, visually impaired, deaf and hard of hearing audiences through descriptive video services and closed captioning.

WUMB-FM, Boston produces and airs *The Quiet Storm*, a weekly program designed specifically to meet the interests of Boston's African-American community, and *Fusion Latina*, a bilingual, locally-produced program designed to meet the needs of the Latino population in Massachusetts.

WICN-FM, Worcester featured a special during a series entitled *People Behind the Faces* focusing on the growing Hispanic and Asian communities in its listening area.

Michigan

WUOM-FM, Ann Arbor presented a live local broadcast of the National Public Radio program *Talk of the Nation*, hosted by Ray Suarez, in conjunction with the University of Michigan's Dr. Martin Luther King, Jr. Symposium. The broadcast was presented as part of National Public Radio's President's Initiative, a project designed to increase the awareness of public radio among people of color and college students.

WDET-FM, Detroit produced and aired DETROIT: 1967-1997 - A Look Back, a week-long series on the 30th anniversary of the Detroit riots.

WTVS-TV, Detroit produced and distributed two literacy videos which train adult basic education teachers.

WKAR-FM, East Lansing features over 200 hours per year of Spanish-language programming produced in its studios. This programming includes music and information for the local Hispanic community.

WKAR-TV, East Lansing produces *Streetwatch Lansing*, a local call-in show which looks at how various agencies help solve problems in the Greater Lansing area. The program frequently discusses the problems of its minority and diverse audiences.

WFUM-TV, Flint produced *Singing Hands*, featuring students from the Michigan School for the Deaf, in order to promote the continued growth and acculturation of deaf students within a hearing society.

WGVU-FM, Grand Rapids produces a weekly four-hour Tejano Music program in Spanish.

WGVU-TV, Grand Rapids aired the Spanish version of Sesame Street, Plaza Sesamo.

WIAA-FM, Interlochen produced several feature reports concerning Native American hunting and fishing rights, racial attacks, and regional English as a second language programs.

WMUK-FM, Kalamazoo provided special reports on items of concern to minorities in its community, including a feature on the bicentennial observation of the birth of Sojourner Truth in Battle Creek.

WNMU-FM, Marquette airs National Native News on a daily basis.

WNMU-TV, Marquette focused its efforts on literacy in the home and workplace, spearheading the Upper Peninsula Project PLUS Task Force.

WCMU-FM, Mount Pleasant broadcasts programming by and for local Native Americans.

WEMU-FM, Ypsilanti interviews members of the minority community on an informal, yet regular basis, to determine issues of importance to this segment of its listening audience.

Minnesota

Minnesota Public Radio participates in the Minnesota Family Strength Project designed to provide ideas on how family, school, the workplace and social service agencies help strengthen families, and produced a Citizen's Forum on low income housing.

KWCM-TV, Appleton broadcasts the GED in Spanish program, as well as the English GED programs.

KSMQ-TV, Austin implemented a summer Ready to Learn project for migrant workers and their families. Over 110 children in two cities benefited from the project.

KAWE-TV, Bemidji held meetings with officials of the Ojibwa Tribe regarding its outreach efforts in preschool education.

KUMD-FM, Duluth broadcasts National Native News daily during morning drive time.

WDSE-TV, Duluth joined forces with a local newspaper and a local community group to produce Men As Peacemakers: Take Responsibility For Ending Violence. This special combined documentary segments produced by WDSE that focused on the violence caused by men with a live, in-studio discussion that centered on ways of reducing violence in homes, schools, and communities. Members of the Native American and African-American communities participated in the studio discussions and in documentary segments.

KAXE-FM, Grand Rapids integrates music by Native people into its entire, locally-produced music schedule.

KBEM-FM, Minneapolis broadcasts a weekly music and information program in Spanish.

KFAI-FM, Minneapolis broadcasts programs in 10 languages, including Hmong, Cambodian, Amharic, Somali, and Spanish.

KTCA-TV, Minneapolis produced a 90 minute *People's Summit* special devoted to the growing tension between Minnesota's communities of color and the local commercial media.

KUOM-AM, Minneapolis broadcasts a weekly program of international music focusing on music from the cultures of its listening area's primary immigrant groups from Northeast Africa, Southeast Asia, Iran, and South and Central America. The station also promotes concerts by musicians from these cultures.

<u>Mississippi</u>

Mississippi Educational Television added closed captioning to most of its local programming, expanding its service to the deaf and hearing-impaired community.

WUSM-FM, Hattiesburg airs a bilingual news program in English and Spanish.

WJSU-FM, Jackson produces and broadcasts public affairs and cultural programming that seeks to educate, inform and entertain the African-American community, as well as the community at large.

WMPN-FM, Jackson broadcast special programs highlighting the accomplishments of African-American composers and performers. These included nationally syndicated programs on Andre Watts, Marian Anderson, and William Warfield, and a locally-produced program on William Grant Still.

Missouri

KBIA-FM, Columbia produced several features for Black History Month, including stories about the opening of the area's Black Cultural Center and an interview with Dr. Julius Thompson of the newly developed Black Studies Program at the University of Missouri - Columbia.

KOPN-FM, Columbia expanded its Saturday programming hours focusing on African-American issues and culture.

KJLU-FM, Jefferson City is licensed to Lincoln University, a historically black university. Its format is 100 percent African-American music with an emphasis on jazz and rhythm and blues.

KCPT-TV, Kansas City held two live call-in television programs to inform, educate, and enroll viewers in the Spanish language version of its successful GED on TV project.

KCUR-FM, Kansas City, features a Spanish language music and information service on a weekly basis.

KKFI-FM, Kansas City broadcasts in Spanish and Persian, and features four hours weekly of Native American programming.

KUMR-FM, Rolla operates an innovative program, Civil Solutions, that uses community ascertainment to identify local needs and addresses the needs in a comprehensive manner.

KDHX-FM, Saint Louis broadcasts a Latin music and bilingual news and information service.

KETC-TV, Saint Louis produces *Mosaic*, a weekly half-hour program that addresses the needs and concerns of its minority viewing audience.

KWMU-FM, Saint Louis carries both news and talk programming that focuses on ethnically diverse audiences and issues including commentary on urban issues from African-American journalist Gregory Freeman.

KSMU-FM, Springfield devotes a three-hour block of programming to a music show targeted to the African-American community.

Montana

KUSM-TV, Bozeman is the home of *Native Voices Public Television*, which gives independent Native American producers support to produce films and television programs. *Native Voices* has been producing award-winning documentaries with Montana Public Television for more than eight years.

KUFM-FM, Missoula broadcasts a daily adult reading program.

Nebraska

The Nebraska Network conducted an outreach project on HIV in both English and Spanish, and conducted bilingual workshops on children's programming.

KUCV-FM, Lincoln, with the help of the Nebraska State Historical Society, sent a producer to travel the state gathering reports about Nebraska's Hispanic heritage.

KZUM-FM, Lincoln broadcasts locally-produced Spanish and Vietnamese language programs.

KIOS-FM, Omaha produced and broadcast *The African-American Experience*, hosted by representatives of the local NAACP chapter, and *Community Forum*, designed to familiarize listeners with services being provided to and for members of the local minority community.

KVNO-FM, Omaha produces and airs La Hora Latina, a Spanish language program featuring music, information and interviews.

Nevada

KLVX-TV, Las Vegas features Community Matters, a locally-produced weekly program that focuses on issues of significance to the African-American community

KUNV-FM, Las Vegas broadcasts programs in Spanish and German, and produces Kwasa-Kwasa, a weekly show featuring music with an African beat.

KNPB-TV, Reno regularly airs GED on TV in both English and Spanish language versions.

New Hampshire

New Hampshire Public Television's documentary-formatted public affairs program, Hitting Home, took a closer look at the impact on minorities of New Hampshire's predominantly white racial make-up. Beyond Black and White focused on profiling everyday life for members of New Hampshire's minority community.

New Jersey

New Jersey Network (television) produced and aired Rose's Melting Pot, a half-hour special exploring the cuisine, art and music of India in the Garden State.

WBJB-FM, Lincroft carries Latino USA each week.

WBGO-FM, Newark hosted a town hall forum in Newark, New Jersey, which examined the city 30 years after the 1967 racial violence. The guests included community residents and key African-American leaders who were involved in the disturbance.

WWFM-FM, Trenton offers three public affairs programs weekly which directly appeal to diverse audiences in its listening area.

New Mexico

KANW-FM, Albuquerque provides programming to meet the needs of a largely Hispanic audience, including educational English as a second language programming. The station also carries Navajo and Zuni programming.

KNME-TV, Albuquerque produces and airs *COLORES!* a weekly cultural affairs series that features the art, culture, and history of New Mexico's diverse communities.

KCIE-FM, Dulce broadcasts to a largely Jicarilla Apache audience, helping to provide language lessons while preserving the tribe's culture.

KRWG-FM, Las Cruces produces a bi-weekly, bilingual Hispanic public affairs program.

KRWG-TV, Las Cruces produces a live local news program that focuses on local issues of interest to minorities in its viewing area including such topics as education, health care, immigration concerns and welfare reform. The program features a recap of the news in Spanish.

KABR-AM, Magdalena broadcasts to an audience whose first language is mostly Navajo, and most of its local programming is produced in both Navajo and English.

KTDB-FM, Pine Hill translates much of its programming into the Navajo language.

KSHI-FM, Zuni broadcasts in the Zuni language. The station collaborated with the Children of the Middle Earth theater ensemble to provide a five-part history and storytelling series.

KENW-TV, Portales produces a local Hispanic affairs program in Spanish.

New York

WAMC-FM, Albany produces Word for the Wise, a daily two minute English language usage and etymology program that airs on stations around the world and on several Spanish language stations in the United States. The show is designed to be particularly helpful to those for whom English is a second language.

WSKG-FM, Binghamton participated in a community-wide outreach partnership called Facing Our Future with other area media and with the Binghamton University. The purpose of the partnership was to examine the area's economic difficulties and how they affected all segments of the population, including minority communities.

WSKG-TV, Binghamton offers workshops on diversity through its education department.

WBFO-FM, Buffalo airs Salsa! a weekly program for the Buffalo area Hispanic community.

WNED-FM, Buffalo, a classical music station, regularly schedules works by African-American composers and performers.

WNED-TV, Buffalo broadcasts GED on TV in English and Spanish. It follows the broadcasts with locally-produced Job Spots profiling some of the station's GED On TV students who are striving to get better jobs by enrolling in this unique distance learning program.

WSLU-FM, Canton regularly covers issues of interest to minority and diverse communities in its public affairs and call-in programs.

WLIW-TV, Garden City airs GED and English as a second language courses, which are designed to be especially helpful to recent immigrants and illiterate adults.

WEOS-FM, Geneva broadcasts a weekly Spanish language music and news program.

WJFF-FM, Jeffersonville works with local public schools to provide training for at-risk and learning disabled students.

WBAI-FM, New York broadcast a full day of coverage, analysis and music on the annual Caribbean/West Indian Day, and a month of special coverage on the heritage, culture and politics of the Hispanic community.

WFUV-FM, New York broadcasts ethnic programming in Gaelic and German.

WNET-TV, New York offered a Women's Health Day with call-in services available in several languages. Callers were provided with guidance as to how to obtain free or low-cost health care services.

WNYC-FM, New York serves the needs of its multi-ethnic, multicultural community through a mix of music, talk and news programming that covers local issues and cultural events.

WNYE-FM, New York broadcasts cultural and informational programming in English and 12 other languages.

WNYE-TV, New York, licensed to the New York City Board of Education, provides educational and instructional programming to over 1,000,000 students, approximately 80 percent of whom are minorities.

WCFE-TV, Plattsburgh, through the CPB-funded Ready to Learn Service, offered training to 95 childcare providers and parents in low income areas, providing healthy family television viewing techniques, storybook reading ideas, arts and crafts suggestions, and free books for children.

WXXI-FM, Rochester participates in a monthly ascertainment forum, to assess the needs of the greater Rochester area and to identify community issues. The ascertainment process helps define the focus of the station's news programming.

WXXI-TV, Rochester produces a weekly Spanish language news and cultural program, Que Pasa Rochester.

WMHT-FM, Schenectady celebrates the diversity of American culture with a locally-produced program, *The American Sound*. The program focuses on the great breadth of American composition styles and music making, including works by African-Americans, Hispanics, and other ethnic groups.

WMHT-TV, Schenectady produced the first three-state symposium on the issue of welfare reform in the country's three most populous states.

WAER-FM, Syracuse recorded Syracuse University's annual tribute to Dr. Martin Luther King, Jr., and provided tapes of the event to the social studies departments of area junior high and high schools for use in class.

WCNY-FM, Syracuse actively promotes the music and performances of minorities.

WCNY-TV, Syracuse serves the blind and print-handicapped with Read-Out, a 19-hour-a-day radio reading service, staffed by over 100 trained volunteers.

North Carolina

North Carolina Center for Public Television offers *Black Issues Forum*, a weekly series that investigates the needs and concerns of the African-American community and examines how race issues affect the community as a whole. Programs explore education, poverty, professional networking, crime and many other community-wide issues.

WUNC-FM, Chapel Hill devotes a significant amount of its local public affairs programming coverage and news coverage to addressing issues concerning African-Americans and Hispanics.

WFAE-FM, Charlotte produces numerous features for and about the African-American community through its news department.

WTVI-TV, Charlotte participated in the Family Literacy Alliance, a community and educational initiative that uses literature-based public television programs and books to encourage at-risk parents to read with their children.

WDAV-FM, Davidsonville addresses subjects of interest to diverse audiences through its public affairs programming.

WRVS-FM, Elizabeth City addresses the needs of its largely African-American, low-income listening area through a variety of community outreach efforts, including a Christmas toy drive to benefit a local shelter for victims of domestic violence, and a prostate cancer screening for African-American men.

WFSS-FM, Fayetteville provides music and news programs for Native Americans and Hispanics.

WSHA-FM, Raleigh features a Latin music program in Spanish on a weekly basis.

WNCW-FM, Spindale produces and airs *Ritmo Latino*, a one hour music and information program on Sunday evenings.

WHQR-FM, Wilmington aired features on the Johkankus festival, an African-American tradition which has its roots in Africa but got its American start in Wilmington, and Pokomoke, an African-American community which thrived on a self-sufficient basis after local rice plantations ceased operations.

WFDD-FM, Winston Salem broadcasts Neighborhood News weekly, which is specifically aimed at disabled and other diverse audiences.

North Dakota

Prairie Public Television serves a rural, geographically dispersed, thinly populated region. Through its distance education programs for high school students, it offers the only access to a foreign language course for students in many of North Dakota's rural high schools.

KEYA-FM, Belcourt is located on the Turtle Mountain Chippewa reservation and broadcasts much of its cultural programming in the local Mitchig language, which is a mixture of Chippewa, French and Cree.

KDSU-FM, Fargo works closely with minority student offices at area colleges to produce and broadcast two hours of Hispanic programming weekly.

KMHA-FM, New Town, a Native American-controlled station, promotes the local GED/Adult Basic Education organization.

Ohio

WAPS-FM, Akron offers more than 15 hours each weekend of programming service to Latin American, Indian, Brazilian, and Eastern European communities.

WOUB-FM, Athens broadcasts music and public affairs programs targeted to the minority population each weekend.

WOUB-TV, Athens offers GED on TV programming.

WBGU-TV, Bowling Green broadcasts Crossroads Café, which is designed to teach English to speakers of other languages.

WCET-TV, Cincinnati broadcasts Building Bridges, a local celebration of cultural diversity through a variety of programming by and about minorities.

WGUC-FM, Cincinnati launched a major initiative to attract new audiences, especially minority and other diverse audiences, to classical music by providing compelling, relevant context for the music that is both substantive and fun.

WVXU-FM, Cincinnati organized and broadcast a town meeting to discuss the issue of ethnic diversity in the workplace. The focus of the discussion was the growing number of people of Hispanic origin who have made the area their home.

WCPN-FM, Cleveland participated in the National Public Radio Audience Initiative, a project which had the goal of creating awareness of public radio among college students and minorities. The project included a student forum at a local university with a significant minority student population.

WVIZ-TV, Cleveland completed a major outreach effort to raise community awareness of the problems associated with youth violence. The project featured broadcast programs, including one produced by young people themselves, and full day conferences in which young people of all races, religions and ethnic backgrounds shared solutions.

WCBE-FM, Columbus devoted many hours of programming to cultural and minority concerns and issues via *INFOHIO*, a locally-produced news and public affairs program.

WOSU-FM, Columbus broadcasts a locally-produced, weekly program entitled *Black Studies Broadcast Journal*, which is produced by the African-American Studies Department at the station's licensee, Ohio State University.

WOSU-TV, Columbus produced the historical documentary The Underground Railroad in Central Ohio.

WDPR-FM, Dayton initiated a community collaboration to write, produce, and broadcast 26 radio dramas featuring the history of Dayton. This effort highlights contributions made by citizens of diverse cultural backgrounds.

WPTD-TV Dayton collaborated with area literacy programs to serve Dayton's large population of adults who do not have high school diplomas. The result of this joint effort is a GED on TV program that is produced by the station with outreach and project support provided by local literacy groups.

WMUB-FM, Oxford broadcast a full line-up of programs for Black History Month in conjunction with its licensee, Miami University. African-American artists were highlighted in the daily jazz offerings, and a special program was devoted to the Clef Club, an organization that promotes African-American music.

WGTE-TV, Toledo provides early learning workshops for parents and childcare providers that include a diversity component designed to help children and their parents celebrate the differences in our cultures and languages.

WCSU-FM, Wilberforce, an African-American controlled station, has developed an urban/jazz format to serve diverse audiences.

Oklahoma

The Oklahoma Network (television) airs GED on TV, providing instruction to those in need of a high school equivalency degree at a time that is convenient for them.

KRSC-TV, Claremore broadcasts a live, interactive, instructional course in Spanish.

KGOU-FM, Norman added *Native America Calling* to its lineup of Native American programming.

KOSU-FM, Stillwater featured locally and nationally produced programs for Black History Month.

Oregon

Oregon Public Broadcasting (television) produced *The Oregon Story*, a documentary series featuring the historic Oregon industries of ranching, logging and fishing. The series examined the role of Native Americans in the development of these industries. The network is also revising an independently produced documentary which explores the history of a major labor strike by sugar cane workers (primarily of Asian descent) in Hawaii in the 1940's.

KSOR-FM, Ashland stays in touch with local Hispanic and Native American residents through meetings with minority organizations and contact with individual leaders within these communities. Issues identified through these meetings are explored on its weekly magazine program, Journal of the Americas.

KMUN-FM, Astoria targets the Hispanic, Vietnamese, Sudanese and African-American communities with its active training and internship programs.

KLCC-FM, Eugene features a regular service of bilingual (English and Spanish) programming each week.

KRVM-FM, Eugene produces and airs *Indian Time*, a show hosted by Native Americans featuring Native music, and *El Centro*, a Spanish language program featuring Latin rock.

KSYS-TV, Medford broadcasts *Homework Hotline*, a local production in cooperation with the local school district that features a live Spanish language translation on the station's secondary SAP channel.

KBOO-FM, Portland broadcasts in Spanish, Farsi, Chinese, Laotian, and Yiddish. The station features about 53 hours per week of programming produced by people of color.

KOPB-FM, Portland produces daily news and features reports that cover issues of concern to Native Americans, migrant farm workers and other people of color in its listening area.

Pennsylvania

WLVT-TV, Allentown produces and airs its monthly public affairs program Panorama Latino in Spanish. The station also features an annual Tax Tips program in Spanish.

WDIY-FM, Bethlehem broadcasts Latino, Arabic and Indian music programs on a weekly basis.

WPSX-TV, Clearfield produces *Take Note*, a nightly interview program, which frequently addresses the needs of minority and diverse audiences.

WQLN-FM, Erie broadcasts a weekly music and information program in Spanish.

WITF-TV, Harrisburg regularly targets its family literacy initiatives to special needs and minority audiences, aiming to reach beginning readers who are at risk for low reading achievement due to parental illiteracy, socioeconomic factors, or speaking English as a second language.

WLCH-FM, Lancaster serves a primarily Spanish-speaking audience and broadcasts in English and Spanish.

WHYY-FM, Philadelphia runs an active community education and outreach department, which emphasizes participation from minority and diverse audiences through call-ins, onlocation broadcasts and special events.

WHYY-TV, Philadelphia produced more than two dozen short programs focusing on diverse cultural groups in the Delaware Valley.

WYBE-TV, Philadelphia produces two regular programs geared specifically to minority audiences: Conexion Latina for the Latino community, and Community Forum for the African-American community. The station also dedicates its entire Sunday schedule to programming for viewers to whom English is a second language.

WDUQ-FM, Pittsburgh features Music from India, a series of music and cultural information from the Indian subcontinent.

WQED-FM, Pittsburgh received a grant from The Pittsburgh Foundation to continue its Multi-Cultural Arts Initiative. This grant provides funding for an internship for an African-American arts producer.

WQED-TV, Pittsburgh produces Black Horizons, a weekly series that examines issues and events important to the minority community. The station also produced the documentary Me

Too, Junior, which chronicles the story of an African-American family from World War II to the present.

WVIA-TV, Scranton produced a nationally-distributed documentary on multiple sclerosis. *Ride the Brain Waves* is the story of WVIA's Vice President of Development and her struggle to cope with the effects of multiple sclerosis.

WPSU-FM, University Park produces *Hispanic Heritage* and *Totally Gospel*, programs that are designed to address the interests of Hispanic and African-American audiences.

Puerto Rico

WMTJ-TV, Fajardo meets the needs of both Spanish and English speakers with a variety of news, public affairs, documentary and cultural programming.

WIPR/WIPM-TV, San Juan produces Ciencia y Tecnología, a science and technology series. The station also provides several Spanish language children's programs.

WRTU-FM, San Juan has been awarded a grant to produce a series on prevention of alcohol, tobacco and drug use and abuse by children and adolescents.

Rhode Island

WSBE-TV, Providence airs GED on TV, which impacts newer immigrants seeking a high-school equivalency degree, and Crossroads Café, which teaches English as a second language.

South Carolina

South Carolina Educational Television worked with the University of South Carolina and the Columbia Urban League to produce a program about the National Black Family Summit, an event which brings together many professionals from South Carolina and the nation to discuss topics relevant to the black experience. The network also worked with the local Indian community to purchase and present programming about the fiftieth anniversary of India's freedom.

WSSB-FM, Orangeburg airs Night Talk, a program targeting African-American listeners.

South Dakota

South Dakota Public Television focuses its Sesame Street Preschool Education Project training program on rural and Native American Audiences. The network also produces a weekly series called The Buffalo Nation Journal. Once a month, the series is a prime-time call-in program devoted to issues of importance to the Indian audience. In other weeks the series features Native-oriented programs, including both local productions and acquired shows.

KILI-FM, Porcupine gears almost all its programming to a Native American audience, broadcasting in English and the Lakota language.

KUSD-FM, Vermillion carries the daily series *National Native News* and features locally produced news features about the Native American community.

Tennessee

WUTC-FM, Chattanooga is the area's only outlet for jazz and is a center of interest for the African-American community.

WTCI-TV, Chattanooga produced the public affairs special *Healthcare Crisis in Black America*, which was developed in cooperation with local minority organizations and community leaders.

WCTE-TV, Cookeville works with the area's Literacy Council to assist in providing adult education services.

WSJK-TV, Knoxville works closely with adult basic education agencies in its coverage area, and distributes GED on TV instructional workbooks to students at reduced cost.

WUOT-FM, Knoxville produces call-in programs and in-depth news reports relating to issues important to the black community.

WLJT-TV, Martin produces a weekly public affairs program that has focused on many issues of importance to minorities and other diverse audiences.

WKNO-FM, Memphis aired features on the Memphis Black Arts Alliance, the Filipino-American Foundation, the Memphis Black Repertory, the National Civil Rights Museum, and the Mid-South Mental Health Alliance.

WKNO-TV, Memphis airs GED on TV classes and offers parenting seminars to minority and low income parents.

WYPL-FM, Memphis is a radio reading service, exclusively serving people who are print impaired. This group includes not only those who are blind, but also people who are physically unable to pick up a book, magazine, or newspaper, and those who are illiterate.

WMOT-FM, Murfreesboro uses its news format to provide an excellent means of reaching minority audiences while informing and entertaining the general population of the region.

WDCN-TV, Nashville broadcasts instructional Spanish language programming which is used by adult Hispanics as they learn English. The station has also extended its Ready to Learn training program to parents in prison.

Texas

KACV-TV, Amarillo covers issues of interest to minority audiences in its public affairs programming.

KLRU-TV, Austin reports on issues of interest to minority and diverse audiences in its public affairs program Austin at Issue. Topics addressed last year included African-American heritage, racial reconciliation, Texas-Mexico relations, and recent Asian immigrants. The station also airs Plaza Sesamo, the Spanish language version of Sesame Street.

KUT-FM, Austin produces In Black America, a weekly half-hour public affairs series on the African-American community in the United States.

KAMU-FM, College Station broadcasts both public affairs and cultural programming designed to meet the needs of minority and diverse audiences.

KAMU-TV, College Station conducts a Ready to Learn training program that works closely with the local minority community.

KEDT-FM, Corpus Christi offers a weekly four-hour program, *Musica Suave*, featuring a mixture of contemporary and indigenous music of Latin America. The station also originates *Latin Dance Party*, where the emphasis is on original dance and music.

KEDT-TV, Corpus Christi broadcast eight weeks of educational programs that are aimed toward meeting the needs of Texas migrant students. The station also aired *Crossroads Café*, an English language instruction program for speakers of other languages.

KERA-TV, Dallas premiered its new weekly public affairs program *On the Record*. The series regularly deals with issues of race relations.

KCOS-TV, El Paso packages a service of programming targeted to a Hispanic audience under the umbrella term *Algo Mas* (Something More).

KTEP-FM, El Paso provides tapes of the children's show Rabbit Ears Radio to two primarily-Hispanic schools as a means of helping the students learn to speak English.

KMBH-TV, Harlingen produced a series on citizenship and English as a second language for new immigrants.

KPFT-FM Houston features a significant amount of programming targeted to a minority audience.

KTSU-FM, Houston added Latin jazz, blues and zydeco programs to its format after completing a needs assessment of its listenership.

KUHF-FM, Houston provides news programming that strives to meet the needs of immigrants and minorities. Immigration, race relations and affirmative action are regularly addressed topics.

KUHT-TV, Houston continued its nightly public affairs program reflecting the diversity of Houston, Week Night Edition. The station also produced and broadcast a live, interactive town meeting as a follow-up to the nationally distributed documentary Back from the Brink. The production, entitled Avoiding the Brink, focused on the diverse neighborhoods that make up Greater Houston and how their unique culture can be preserved and strengthened.

KTPB-FM, **Kilgore** carries regular features during its daily news magazine from the *Latino USA* series. The station also worked with the English as a second language program at Kilgore College to provide practice opportunities for international students at the college.

KNCT-FM, Kileen added two Latin-based music programs which are broadcast in both English and Spanish.

KNCT-TV, Kileen provides childcare workshops and free books to minority parents, children and childcare workers through its Ready to Learn program.

KTXT-TV, Lubbock sponsored the South Plains Parenting Conference, which was attended by a mostly-Hispanic audience of 1200 adults.

KOCV-FM, Odessa offers Hip-Hop/Urban, blues and jazz music programming.

KOCV-TV, Odessa produced public affairs programming addressing issues of importance to minority and underserved audiences.

KPVU-FM, Prairie View features a diversified format (gospel, jazz, urban, blues and reggae) to compliment its diversified audience.

KLRN-TV, San Antonio broadcasts *GED* on *TV* and airs *Project Smart*, a series of instructional programs aimed at migrant children.

KPAC-FM, San Antonio participated in a national project to increase awareness of public radio programming among college students and people of color. The station organized a number of events targeted to Hispanic students, including a town hall meeting produced in conjunction with *Latino USA* to explore the effects of eliminating affirmative action criteria from college admissions policies.

KCTF-TV, Waco gave specially designed parenting workshops for the population of the Texas State Women's Prison.

Utah

KZMU-FM, Moab regularly broadcasts Native American music and airs Latino USA.

KULC-TV, Ogden provides English as a second language programming for people learning to speak English. The favorable portrayal of a diverse and positive racial mix is an important criteria in the selection of K-12 instructional series, and is a priority for locally developed programming as well.

KPCW-FM, Park City devoted more than 100 hours of programming to dealing with issues facing Park City's Hispanic residents.

KBYU-TV, Provo aired programs designed specifically to assist African-American and Hispanic viewers in preparing their family histories.

KRCL-FM, Salt Lake City produces weekly bilingual programs for Native American, Indian, Latin American, Chinese, Vietnamese, Korean, Filipino, Samoan, Tongan, Hawaiian and Tahitian audiences.

KUED-TV, Salt Lake City is developing two locally-produced historical documentaries on minority communities, one on African Americans and the other on Pacific Islanders.

KUER-FM, Salt Lake City regularly covers issues of interest to diverse listeners in its news and public affairs programming.

Vermont

WVPR-FM, Windsor produces several major public affairs series each year, including call-in, commentaries and in-depth reports on subjects of interest to diverse communities.

<u>Virginia</u>

WTJU-FM, Charlottesville produces and airs International Odyssey, a weekly program featuring music of and commentary on various countries and cultures, frequently in their native language.

WVPT-TV, **Harrisonburg** airs the *GED on TV* series in partnership with community-based adult literacy organizations to assist adults in earning their high school diploma. The station also provides descriptive video service for the blind and visually impaired on its local programming.

WHRO-TV, Norfolk produced *Church Street: Harlem of the South*, a local history documentary that told the story of a region in Norfolk with a rich African-American and Jewish heritage.

WHRV-FM, Norfolk helped plan and produce a lecture/concert on the history of slave songs.

WNSB-FM, Norfolk airs a bilingual program targeted to Hispanics as well as an African-American series.

WCVE-FM, Richmond co-sponsors the Second Street Festival, an annual music and fine arts event celebrating the history of a traditionally black neighborhood in Richmond.

WCVE-TV Richmond was a major sponsor for the international Children's Festival, helping kids of all backgrounds and cultures make crafts, perform simple science experiments and play games, all with an educational result. The station also airs GED on TV.

WBRA-TV, Roanoke produces a local public affairs program that deals with issues of interest to the minority communities in its viewing area.

Virgin Islands

WTJX-TV, Saint Thomas produces Mi Santa Cruz, a series geared to Hispanics who have migrated from neighboring islands to the U.S. Virgin Islands. This program offers features on language, the arts, culture and culinary arts.

Washington

KZAZ-FM, Bellingham produced a series of programs designed to serve minority and diverse audiences, focusing on issues such as crime, employment opportunities and domestic violence.

KDNA-FM, Granger serves the Spanish speaking farm workers and immigrants of Eastern Washington with bilingual news and information programming.

KAOS-FM, Olympia offers a variety of regular weekly programs targeted at minority and diverse audiences, including music and information for the Native American, Hispanic and African-American communities.

KWSU-AM, Pullman conducted special outreach activities around the nationally-distributed documentary series Will the Circle Be Unbroken, the story of the civil rights movement. The station produced a special mailing with promotional and program information to send to civil rights organizations, cultural centers, African-American community organizations, and history departments at local colleges and universities.

KWSU-TV, Pullman produces and broadcasts Your Voice, a forum for local university students to address issues relevant to the minority community. The series was produced with the assistance of the Multicultural Center at Washington State University.

KCTS-TV, Seattle developed *Take This Heart*, a production and outreach campaign focusing attention on the needs of children in foster care, a social issue affecting a disproportionate number of minority families.

KPBX-FM, Spokane mounted an in-depth, concentrated effort to help its community bridge the race gap through investigative reports, panel discussions and community affairs programming.

KBTC-TV, Takoma produced a series of Martin Luther King Moments for airing during Black History Month. The station also co-produces and participates in minority job fairs.

KPLU-FM, Takoma has added a community beat to its news department that focuses primarily on minority communities, including new immigrants.

West Virginia

West Virginia Public Television maintains active GED and adult literacy programs.

WVPN-FM, Charleston presented a series of short features about cultural diversity in West Virginia, focusing on immigrant workers in the northern panhandle and other minority groups who have settled in West Virginia.

Wisconsin

Wisconsin Public Television produced *Us and Them*, a documentary that followed a race relations class taught in a local high school from beginning to end. The hour-long special showed the positive impact of understanding and communicating the issues surrounding race. A compendium workbook called *Get Talkin'* was created to encourage others to do the same.

WOJB-FM, Hayward, is owned and operated by the Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin. The station focuses on addressing the many issues facing the Anishinaabeg people of northwestern Wisconsin such as land rights, environmental rights, racism, alcoholism, drug abuse, treaty rights, and sovereignty.

WLSU-FM, La Crosse provides programming designed to help the Hmong population meet the challenges of living in the La Crosse area.

WHA-AM, Madison produces and airs *Higher Ground*, a weekly two-hour call-in program celebrating diversity throughout the state.

WORT-FM, Madison offers music, news and information programs in Spanish and Hmong that are of particular importance to the area's Hispanic and Southeast Asian communities.

WMVS-TV, Milwaukee regularly includes issues affecting minority communities in its public affairs program, Interchange. The station provides broadcast services to the hearing impaired through closed captioning, to the sight impaired through descriptive video service, and to its Spanish-speaking audience through translations broadcast via the second audio program (SAP).

WYMS-FM, Milwaukee produces regular programs in Spanish, German, Ukrainian, Slovenian, Polish, and Croatian.

WXPR-FM, Rhinelander offers local and national programming relating to Native American issues and culture.

Wyoming

KUWR-FM, Laramie airs a diverse schedule of programming, including the daily broadcast National Native News.

KCWC-TV, Riverton uses its public affairs program Main Street, Wyoming to highlight the culture of minority communities in Wyoming, including Native Americans, Chinese immigrants, and those with physical disabilities.